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June 4, 2008

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: Ex Parte Presentation
Numbering for Internet Based Relay
Docket 03-123

Dear Madam Secretary:

This letter is written on behalf of GoAmerica, Inc. and its operating subsidiaries in response to the ex parte presentation submitted in this docket on June, 3, 2008 by counsel for Hamilton Relay, Inc (AHamilton@).

The Hamilton submission lists several numbered points made in meetings on June 2, with the Office of Commissioner Copps and with representatives of the Consumer and Governmental Affairs, Wireline Competition and Homeland Security Bureaus, and states Hamilton=s preference for adoption of what is known as the ONS numbering proposal.

GoAmerica concurs with Hamilton=s first numbered point that relay providers must ensure that IP Addresses are updated in real time under any numbering proposal without regard to the equipment being used by the relay user. However, this is an element of all numbering proposals currently before the FCC. The ONS plan would do this by requiring hardware or software modifications of all existing relay end points, a process GoAmerica believes to be unnecessary, time consuming and unduly costly. The AT&T GoAmerica Joint Proposal would not require end point modifications. Standards based videophones would require no software or hardware upgrades under the Joint Proposal, but rather an end user instruction as to

the appropriate provider gatekeeper to which the device will update. Non-standards based devices, such as the Sorenson VP-100 and 200 would require Sorenson B which manages the devices B to push IP Address data up to the central database. Sorenson indicated in the recent stakeholders' summit that this could be accomplished without end point changes. Other providers managing non-standards based videophones would be required to do likewise.

If end point changes are required by the adoption of ONS, the likelihood is consumers would be denied the benefits of numbering for some time. Sorenson has already indicated in this proceeding that modifying all videophones it has distributed to relay users would likely necessitate a substantial extension of the FCC=s December 31, 2008 deadline for numbering implementation. GoAmerica strongly disfavors any such extension. Consumers have also made it clear they oppose any such extension. Given that Hamilton=s concern can be met without the necessity of end point modifications, Hamilton=s concern is no basis for the Commission to adopt the ONS proposal.

Hamilton=s second numbered point is that the FCC should require relay providers to implement hardware and software modifications so that existing end user equipment will allow the equipment to update the central numbering database in real time. GoAmerica endorses that view as a given. In light of the discussion above, however, there should be little, if any, need for such modifications since under the Joint Proposal modifications are not required to allow end points to update the central database.

Hamilton=s third numbered point is addressed to the need for number conservation. Hamilton is concerned that if individual relay providers must obtain large blocks of local numbers to service relay users, it may result in number scarcity. Hamilton therefore favors one entity distributing numbers, the ONS administrator. Hamilton=s position is not well taken. GoAmerica has found that small blocks of local numbers are readily available at reasonable cost from LECs or CLEC=s. GoAmerica has no objection to the central database administrator being allowed to distribute numbers, but objects to any restriction on where the consumer may obtain a number to use for relay. Consumers should be able to port a local PSTN number obtained from a local exchange carrier and they should be able to obtain a telephone number from any relay provider of their choice. In sum, GoAmerica believes

the Commission should not impose any restriction on where the consumer obtains his or her 10 digit Internet based relay number.

Hamilton further raises a red herring in suggesting that a consumer could obtain 11 different 10 digit numbers. Although perhaps theoretically possible, GoAmerica sees no reason why a consumer would want to engage in such hoarding of relay telephone numbers.

Finally, there has been considerable discussion as well as disinformation on the subject of whether under either the Joint Proposal or the NeuStar NPAC proposal a consumer would be able to obtain a 10 digit number from a provider other than the provider that furnished the consumer his or her videophone. Both proposals contemplate the consumer may assign any number to any videophone no matter where that number is obtained, and both proposals contemplate that consumers may freely designate their preferred provider no matter who might have supplied their videophone or other relay device. Any suggestions to the contrary have no basis in fact.

Should any questions arise concerning this matter, kindly contact this office.

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Very truly yours,

/s/

George L. Lyon, Jr.

cc: Commissioner Michael J. Copps
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